

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Ireen Baykan,  
Plaintiff,

Case Number 16 CV -9048  
**CASE ASSIGNED to the Honorable  
John Z. Lee. Designated as  
Magistrate Judge the Honorable  
Maria Valdez.**

v.  
Golren Enterprises Inc,  
D/B/A, Corfu Restaurant  
and  
Michele Golegos as an individual under FLSA  
and Illinois Wage Laws  
John Golegos as an individual under FLSA and  
Illinois Wage Laws  
Don (last name not known to Plaintiff) as an  
individual under FLSA and Illinois Wage Laws

**Plaintiff Demands Trial By Jury**

Defendants.

**JOINT MOTION FOR APPROVAL OF SETTLEMENT**

Plaintiff **IREEN BAYKAN**, by and through her attorneys, the Law Office of John C. Ireland, and Defendants **GOLREN ENTERPRISES INC, D/B/A, CORFU RESTAURANT, MICHELE GOLEGOS, JOHN GOLEGOS**, by and through its attorneys, Cutler and Hull LLP, **AND DON CHRISTENSEN** *pro se* (collectively the “Parties”) move for approval of the settlement of this action. In support of their motion, the Parties state as follows:

1. Plaintiff filed this action on September 19, 2016, alleging a violation of the Fair Labor Standards Act, 29 U.S.C. 201, et seq. (“FLSA”), and Illinois Minimum Wage Law, 820 Ill. Comp. Stat. 105/1, *et seq.* .

2. Plaintiff also has filed a Charge of Discrimination with the Equal Employment Opportunity Commission naming Defendant Golren as Respondent.

3. There exists between the Parties a *bona fide* dispute. The Parties recognize the outcome in this action is uncertain and achieving a final result through litigation requires additional risk, discovery, time, and expense.

4. After engaging in good faith arms-length negotiations, the Parties have reached a mutually satisfactory confidential resolution of their dispute, the terms of which are memorialized in a Confidential Settlement Agreement and Release of Claims (“Settlement Agreement”). A copy of the Settlement Agreement will be submitted to the Court *in camera* on the date of filing of this motion, but will not be filed in the public record.

5. Additionally the parties signed a Terms sheet, also submitted for in-camera review.

6. Because this is an action seeking recovery of wages owed under the FLSA, the settlement requires court approval. *See e.g. Burkholder v. City of Ft. Wayne*, 750 F. Supp. 2d 990, 994-95 (N.D. Ind. 2010); *Lynn's Food Stores v. United States*, 679 F.2d 1350, 1355 (11<sup>th</sup> Cir. 1982).

7. The Parties agree that the terms of the settlement are fair and reasonable.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order approving the Settlement Agreement after adjudging it to be adequate, proper, fair and reasonable.

Dated: February 27, 2017

Respectfully Submitted,

The Law Offices of John C. Ireland.

Cutler & Hull

By: /s/ John C. Ireland  
One of Its Attorneys

By: /s/ Edwin J. Hull  
One of Its Attorneys

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